

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

FRANCIS WHITE

Criminal No. 03-CR-10356-MLW

**MOTION TO MODIFY TERMS OF
PRETRIAL RELEASE**

Defendant Francis White respectfully requests that this Court modify the terms of his pre-trial release to allow him to travel out of state for a short period of time with his 14 year old son. In support, Mr. White states as follows:

As described in his Motion for Pretrial Release, Mr. White has a very close relationship with Alex; indeed, his devotion to Alex cannot be questioned. Mr. White is very involved in Alex's life: he not only pays weekly child support for Alex, but more importantly, he spends considerable amounts of time with Alex during the school year, as well as holidays and summer vacations.

Mr. White wishes to travel to Loon Mountain, New Hampshire with his son on March 19 through March 21, 2004 to take his son skiing for the upcoming weekend.

As this Court may recall, it previously found that Mr. White is **not** a flight risk. Since that time, there has not been any change in circumstances that would warrant a different conclusion, and there is no reason to believe that Mr. White would not return to Massachusetts to face the charges against him.

WHEREFORE, Mr. White respectfully requests that this Court grant his Motion to Modify Terms of Pretrial Release to allow him to travel to New Hampshire from March 19-21, 2004.

RESPECTFULLY SUBMITTED,
FRANCIS WHITE

By his attorneys,

Patricia DeJuneas/xx
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CERTIFICATE OF SERVICE

I, Patricia A. DeJuneas, hereby certify that I have caused a copy of the foregoing document to be served on Assistant United States Attorney Colin Owyang by first class mail, this 17th day of March, 2004.

Patricia DeJuneas/xx

Patricia A. DeJuneas